

# EXHIBIT A

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January 27, 2025

**VIA MDL CENTRALITY, CERTIFIED MAIL, AND EMAIL**

Re: MDL 3084 – Order re Withdrawal of Counsel in Case No. 3:23-cv-06692-CRB, MDLC ID 1226

Dear J.B.,

We write on behalf of our client, Uber Technologies Inc. (“Uber”), regarding *J.B. v. Uber Technologies, Inc., et al.*, 3:23-cv-06692-CRB, MDLC ID 1226, which you filed in *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB (“the MDL”). On November 19, 2024, Pulaski Kherkher, PLLC, moved to withdraw its representation of you on the grounds that you have “failed to respond to Counsel’s numerous communication attempts via telephone, email and text,” since “September 13, 2024.” *J.B.*, No. 3:23-cv-06692-CRB, ECF 8 at 1 (Exhibit 1). On January 22, 2025, the Court granted that motion. *J.B.*, No. 3:23-cv-06692-CRB, ECF 9 at 1 (Exhibit 2). It is our understanding that you have not found replacement counsel and are no longer represented by an attorney. If that understanding is incorrect, please provide this communication to your attorney, and have your attorney contact us via the information provided above or below as soon as possible.

The Court’s Order states that “Within 28 days of this order, the plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If the plaintiff does not file that notice, the Court will dismiss their case without prejudice.” Exhibit 2 at 1. The Court also ordered Uber’s counsel to “provide a copy of this order to the plaintiff.” *Id.* The Court’s Order is attached to this correspondence as Exhibit 2. Per this Order, you must “file a notice indicating whether [you] intend to pursue the action with new counsel or representing [yourself]” within 28 days of January 22, 2025, i.e. by Wednesday, February 19, 2025, or else “the Court will dismiss [your] case without prejudice.”

We ask that you please email us confirmation of your receipt of this letter, via email to [ksmith@paulweiss.com](mailto:ksmith@paulweiss.com), [lmurray@paulweiss.com](mailto:lmurray@paulweiss.com), and [rcunningham@paulweiss.com](mailto:rcunningham@paulweiss.com), at your earliest opportunity. If you would like to discuss the letter’s contents further, please let us know, and we would be happy to organize a meet and confer.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

J.B.

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Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

By: /s/ Kyle Smith

Kyle Smith  
2001 K Street, NW  
Washington, DC 20006  
(202) 223-7407  
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# EXHIBIT 1

1 D. Douglas Grubbs (*Admitted PHV*)  
Adam K. Pulaski (*Admitted PHV*)  
2 **PULASKI KHERKHER, PLLC**  
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3 Houston, TX 77098  
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5 Email: [adam@pulaskilawfirm.com](mailto:adam@pulaskilawfirm.com)

6 *Counsel for Plaintiff*

7  
8 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
11 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

12  
13 This Document Relates to:

14 *J.B. vs. Uber Technologies, Inc., et al;*  
15 *3:23-cv-06692-CRB*

**MOTION TO WITHDRAW AS COUNSEL  
OF RECORD**

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17 Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel of  
18 record for Plaintiff J.B. ("Counsel"), respectfully moves this Court for an Order allowing his firm to  
19 withdraw as counsel of record in the above-captioned matter.

20 Over the past several months, Plaintiff J.B. has failed to respond to Counsel's numerous  
21 communication attempts via telephone, email and text. Counsel last spoke to Plaintiff on September  
22 13, 2024 when he requested Plaintiff's assistance obtaining additional information from the person  
23 who ordered the ride at issue in order to complete Plaintiff's Fact Sheet. Plaintiff was reluctant to  
24 obtain the additional information and informed Counsel that she would decide whether or not to  
25 pursue this matter over the weekend. For the next two weeks, Counsel continued to follow-up with  
26 Plaintiff regarding her decision, but did not receive a response.  
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1 On October 3, 2024, Counsel advised Plaintiff in writing of his intent to withdraw from this  
2 matter via electronic mail and USPS Priority Mail. At the time of this filing, Plaintiff has still not  
3 responded. Counsel also advised Defendants of his intent to withdraw from this matter during a meet  
4 and confer if he did not hear from Plaintiff.

5 WHEREFORE, the law firm of Pulaski Kherkher, PLLC; and all attorneys of record for  
6 Plaintiff request that they be allowed to withdraw as counsel of record for Plaintiff J.B. A copy of  
7 this motion will be served upon Plaintiff at her last known address and via electronic mail.  
8

9  
10 Dated: November 19, 2024

Respectfully submitted,

11 **PULASKI KHERKHER, PLLC**

12 /s/ D. Douglas Grubbs

13 D. Douglas Grubbs (TX Bar No. 24065339)

(Admitted Pro Hac Vice)

14 Adam K. Pulaski (TX Bar No. 16385800)

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18 [adam@pulaskilawfirm.com](mailto:adam@pulaskilawfirm.com)

19 Counsel for Plaintiff  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 19, 2024, I electronically transmitted the foregoing MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: [MDL3084-service-Uber@paulweiss.com](mailto:MDL3084-service-Uber@paulweiss.com).

/s/ D. Douglas Grubbs  
D. Douglas Grubbs

1 D. Douglas Grubbs (*Admitted PHV*)  
Adam K. Pulaski (*Admitted PHV*)  
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6 *Counsel for Plaintiff*

7  
8 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
11 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

12  
13 This Document Relates to:

14 *J.B. vs. Uber Technologies, Inc., et al;*  
15 *3:23-cv-06692-CRB*

**[PROPOSED] ORDER GRANTING  
WITHDRAWAL OF COUNSEL OF  
RECORD**

16  
17 CONSIDERING the foregoing Motion to Withdraw as Counsel of Record for J.B.

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19 IT IS HEREBY ORDERED that Pulaski Kherkher, PLLC is withdrawn as Plaintiff's counsel  
20 of record and shall be relieved of any further responsibility in connection with this action.

21 Dated: \_\_\_\_\_

22 HONORABLE CHARLES R. BREYER  
23 United States District Court Judge  
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# **EXHIBIT 2**

United States District Court  
Northern District of California

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084

This Order Relates To:

*J.B. v. Uber, Inc.*,  
Case No. 3:23-cv-06692-CRB

**ORDER GRANTING MOTION TO  
WITHDRAW**

Re: Dkt. No. 1896

The motion to withdraw filed by Plaintiffs' counsel in the above-captioned case is granted. Within 28 days of this order, the plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If the plaintiff does not file that notice, the Court will dismiss their case without prejudice.

Uber's counsel shall provide a copy of this order to the plaintiff and file a declaration within 7 days of this ruling explaining how they did so.

**IT IS SO ORDERED.**

Dated: January 22, 2025



CHARLES R. BREYER  
United States District Judge